

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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Jerry's Enterprises, Inc.,

Case No.: \_\_\_\_\_

Plaintiff,

vs.

U.S. Specialty Insurance Company,

Defendant.

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**NOTICE OF REMOVAL**

**(Jury Trial Demanded)**

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE, that Defendant U.S. Specialty Insurance Company hereby removes to this Court the state action described below.

- I. On May 30, 2014, an action was commenced as to U.S. Specialty Insurance Company in the Fourth Judicial District, Hennepin County, Minnesota, entitled Jerry's Enterprises, Inc. v. U.S. Specialty Insurance Company, Case No. (case has not been filed).
- II. Defendant U.S. Specialty Insurance Company was served with the attached Summons and Complaint on June 9, 2014. This Notice is timely.
- III. A copy of all process, pleadings, and orders served upon Defendant in the state court action are attached hereto as Exhibit A (Summons and Complaint).
- IV. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. §1332, and is one which may be removed to this Court by said Defendant pursuant to the provisions of 28 U.S.C. §1441 (a), in that it is a civil action between citizens of different states and the matter and controversy exceeds the sum of \$75,000, exclusive of interest and costs. The undersigned has confirmed with counsel for Plaintiff that the amount in controversy exceeds the sum of \$75,000.

- V. Defendant is informed that Plaintiff Jerry's Enterprises, Inc. is incorporated and headquartered in the State of Minnesota. Defendant U.S. Specialty Insurance Company is incorporated in and has its principal place of business in the State of Texas.
- VI. Based upon the foregoing, Defendant U.S. Specialty Insurance Company requests that this action be removed to the United States District Court for the District of Minnesota.

Dated this 17<sup>th</sup> day of June, 2014.

**McCOLLUM, CROWLEY, MOSCHET  
MILLER & LAAK, LTD.**



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